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September 16, 2002

VIA HAND DELIVERY

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RECEIVED

SEP 16 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Attention: Stop Code 1800E1-PB
Television Branch

Re: MM Docket No. 00-246
KRTV(TV), Great Falls, Montana (Facility ID No. 35567)

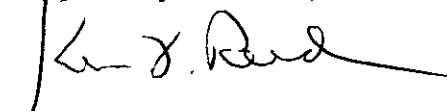
Dear Ms. Dortch:

On behalf of KRTV Communications, Inc. ("KRTV Communications"), licensee of Television Station KRTV(TV), Great Falls, Montana, and in response to the concerns set forth in the Commission's June 17, 2002 notification (the "Notification"), we hereby submit the enclosed Supplement to Comments in the above-referenced rulemaking proceeding proposing to substitute Channel 7 for Channel 44 as KRTV(TV)'s paired DTV allocation.

In the Notification, the Commission reported that the Canadian government had objected to KRTV Communications' proposed facilities on the basis of its assessment that the proposed facilities do not adequately protect NTSC station CISA-TV (Lethbridge, Alberta). The Commission requested that KRTV Communications modify the proposed facilities to eliminate the overlap. The Supplement to Comments addresses these concerns by replacing the non-directional antenna proposed for KRTV-DT with a directional antenna.

Please contact the undersigned if there are any questions with respect to this filing.

Respectfully submitted,



Kevin F. Reed

cc: Ms. Pam Blumenthal (FCC) (Stamp and Return copy) (via email)
Mr. James Ballis (FCC) (Stamp and Return copy) (via email)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

In the Matter of)
)
Amendment of Section 73.622(b))
Table of Allotments,)
Digital Television Broadcast Stations)
(Great Falls, Montana))

MM Docket No. 00-246
RM-9859

RECEIVED

To: Chief, Video Division
Media Bureau

SEP 16 2002

SUPPLEMENT TO COMMENTS

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

KRTV Communications, Inc. ("KRTV Communications"), licensee of KRTV(TV), Great Falls, Montana, by its attorneys and pursuant to a notification by the Commission and Sections 1.401 and 73.622(a) of the Commission's Rules,¹ respectfully supplements its comments filed on February 5, 2001 in the above-referenced proceeding. On December 15, 2000, the Commission released a *Notice of Proposed Rule Making* (the "Notice") to amend Section 73.622(b), the DTV Table of Allotments, by substituting Channel 7 for Channel 44 for use by KRTV-DT, and on February 5, 2001, and February 20, 2001, KRTV Communications filed comments and reply comments, respectively. No other parties filed comments.

In a notification dated June 17, 2002 (the "Notification"), the Commission reported that the Canadian government had objected to KRTV Communications' proposed facilities on the basis of its assessment that the proposed facilities do not adequately protect NTSC station CISA-TV (Lethbridge, Alberta). The Commission requested that KRTV Communications modify the proposed facilities to eliminate the overlap. On July 17, 2002, and August 16, 2002, KRTV Communications responded and requested an extension of time to prepare a complete response.

¹ 47 C.F.R. §§1.401, 73.622(a) (2001).

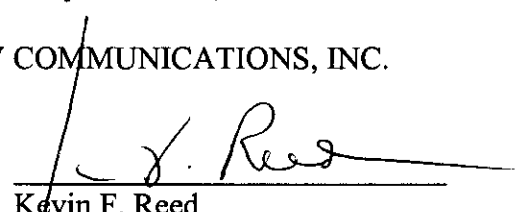
In response to the concerns raised by the Commission in the Notification and as detailed in the attached Engineering Statement, KRTV Communications hereby supplements its comments to substitute a directional antenna for KRTV-DT's proposed facilities in lieu of the non-directional antenna initially proposed.² All other parameters of the proposed facilities remain the same,³ and KRTV-DT's proposed service area will encompass the community of license as required.⁴

For the reasons set forth in its Petition for Rulemaking and its comments and reply comments filed in this proceeding, KRTV Communications respectfully requests that the Commission promptly adopt the changes proposed in the *Notice* and amend Section 73.622(b) of its Rules to substitute Channel 7 for Channel 44 for use by KRTV-DT at the specified reference point in Great Falls, Montana.

Respectfully submitted,

KRTV COMMUNICATIONS, INC.

By:


Kevin F. Reed
Nam E. Kim

Its Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W., Suite 800
Washington, D.C. 20036-6802
(202) 776-2000

Dated: September 16, 2002

² See attached "Engineering Statement Amendment to Petition for Rule Making" prepared by Cohen, Dippell and Everist, P.C., September 2002 ("Engineering Statement").

³ *Id.*

⁴ 47 C.F.R. §73.623(c)(1). See Engineering Statement.

ATTACHMENT

Engineering Statement

ORIGINAL

ENGINEERING STATEMENT
AMENDMENT TO
PETITION FOR RULE MAKING
SECTION 73.622 OF THE FCC RULES
TO CHANGE DTV CHANNEL
ON BEHALF OF
KRTV COMMUNICATIONS, INC.
KRTV-DT, GREAT FALLS, MONTANA
CHANNEL 7 160 KW DA MAX 180 METERS

SEPTEMBER 2002

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

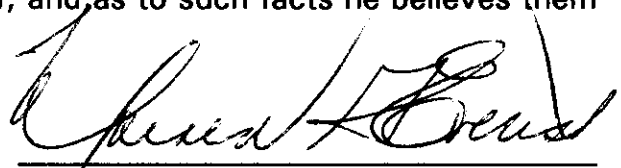
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

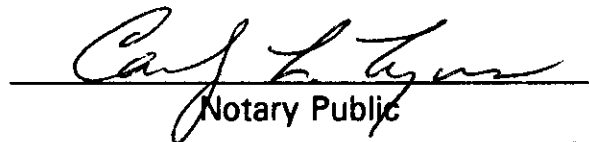
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 13th day of September, 2002.


Notary Public

My Commission Expires: 2/28/2003

This engineering statement has been prepared on behalf of KRTV Communications, Inc., licensee of Television Station KRTV(TV), Great Falls, Montana, NTSC Channel 3. This statement supports an amendment to the pending petition to change the current digital television channel allotment contained in Section 73.622 of the FCC Rules from UHF Channel 44 to VHF Channel 7 at the maximum VHF-DT power of 160 kW. The current pending petitions specifies 160 kW non-directional and causes contour overlap to Canadian station CISA-TV, Channel 7, Lethbridge, Alberta (Class VU). This amendment specifies a directional antenna that adequately protects all stations. No changes other than the directional pattern are proposed. An azimuth plot and "Tech Box" tabulation of the proposed pattern are attached. The proposed operation will serve the entire community of license.

An allocation study has been performed of the impact of this proposal on other authorized stations (including Class A stations), applications, allotments, and Canadian stations/allotments. This analysis has been performed using the Federal Communications Commission OET Bulletin 69 dated July 2, 1997 and the FCC supplemental processing guidelines dated August 1998. The analysis was performed by using the FCC's Longley-Rice ("FLR") computer code adapted for use on a Windows/Intel computer. The results of this adapted FLR program have been compared to other known FCC studies and have been found to give consistent results. To study predicted interference to Canadian stations, 1996 Canadian population centroids and Global 30-second terrain data from the USGS were used. A protection ratio of 33.8 dB for co-channel DTV to NTSC was used within a protected service area defined by 82 km radius for Class VU.

Existing DTV Table of Allotments, Page B-33¹

<u>DTV Channel</u>	<u>ERP (kW)</u>	<u>HAAT (meters)</u>	<u>R/C AMSL (meters)</u>
44	1000	180	1235

Proposed DTV Facilities

7	160 (directional)	180	1235
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Proposed Site Coordinates, NAD-27 (existing site)

North Latitude: 47°32' 09"

West Longitude: 111°17' 02"

Using the above-described Longley-Rice methodology and the actual operating parameters for CISA-TV, Channel 7 (325 kW non-directional, 204 meters HAAT), the predicted interference to CISA-TV with the proposed directional antenna is 1.4% of the service population. This predicted interference is comfortably less than the 2% deemed generally acceptable in the *Letter of Understanding*. Therefore, the petition as amended complies with all international agreements.

¹ "In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-268, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98.



Exhibit No.

Date
Call Letters
Location
Customer
Antenna Type

23 Aug 2002
KRTV-DT Channel 7
Great Falls, MT

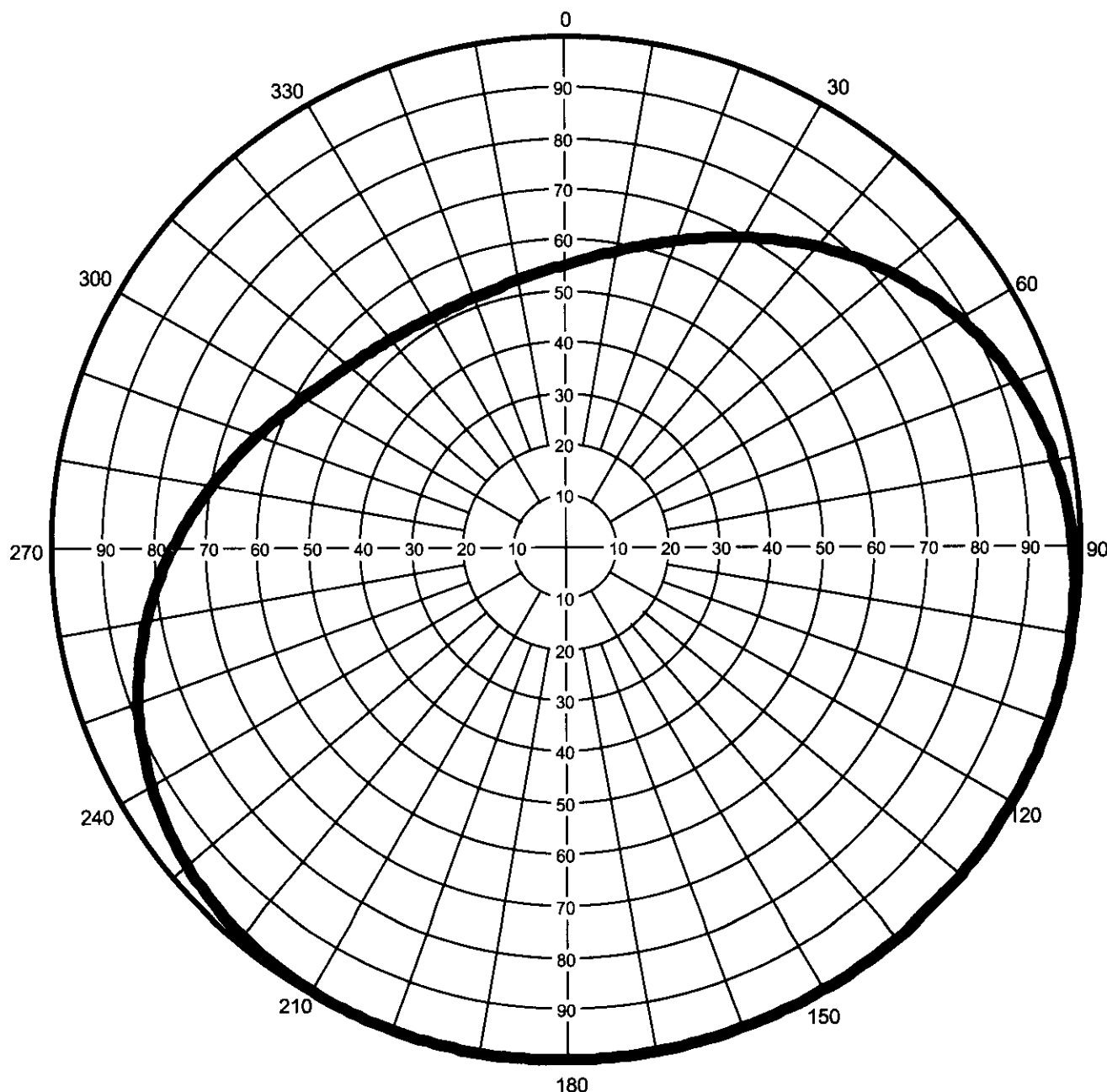
AZIMUTH PATTERN

RMS Gain at Main Lobe
Calculated / Measured

1.40 (1.46 dB)
Calculated

Frequency
Drawing #

177 MHz
THV-C140



Remarks:

TECH BOX

e. Directional Antenna Relative Field Values: ☐ Not applicable (Nondirectional)Rotation: _____ ° ☒ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.550	60	0.885	120	1.0	180	0.999	240	0.931	300	0.586
10	0.586	70	0.931	130	0.999	190	1.0	250	0.885	310	0.550
20	0.636	80	0.964	140	0.997	200	1.0	260	0.828	320	0.528
30	0.697	90	0.985	150	0.997	210	0.995	270	0.763	330	0.518
40	0.763	100	0.995	160	0.997	220	0.985	280	0.697	340	0.518
50	0.828	110	1.0	170	0.997	230	0.964	290	0.636	350	0.528
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.
N/A

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No.
N/A

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.
N/A

13. **Environmental Protection Act.** Submit in an Exhibit the following:

Exhibit No.
N/A

- a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.